

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
)	
v.)	Crim. No. 3:20-cr-30033-2-MGM
)	and
HERBERT WRIGHT III,)	Crim. No. 3:21-cr-30031-1-MGM
)	
Defendant.)	
)	

DEFENDANT'S ASSENTED-TO MOTION TO RELEASE PASSPORT

Now comes Defendant Herbert Wright, III ("Wright") and submits the following assented-to motion to allow the Probation Department to release his passport into his custody, or the custody of a representative for Wright. In support of this motion, Wright states as follows:

1. Wright surrendered his passport to the Probation Department in or around December 2020 pending resolution of this matter.
2. Wright was sentenced by this Court to probation for a term of three (3) years connection with in the above-captioned matter in January 2024.
3. In order to release Wright's passport to him, the Probation Department requires an order of this Court allowing such return. Therefore, Wright requests that this Court allow the Probation Department to release Wright's passport to him or his designated representative.
4. Counsel for Wright has conferred with AUSA Steven Breslow, who assents to this motion. Counsel has also conferred with Officer Richard Rinaldi, Wright's Probation Officer in Springfield, Massachusetts. The U.S. Probation Office takes no position on this matter.

WHEREFORE, Defendant Herbert Wright, III moves that this Honorable Court to ALLOW this assented-to motion and permit the Probation Department to release his passport into his custody or the custody of a designated representative.

HERBERT WRIGHT, III,

By his attorney,

/s/ James W. Lawson
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Date: March 14, 2024

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the CM/ECF system on March 14, 2024 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and by first-class mail to any non-registered participants.

/s/ James W. Lawson
James W. Lawson